

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

STATE OF NEW YORK, et al.,

Plaintiffs,

v.

EUGENE SCALIA, et al.,

Defendants.

20 Civ. 1689

DECLARATION OF FIONA J. KAYE

Fiona J. Kaye, pursuant to penalty of perjury under 28 U.S.C. § 1746, does hereby state the following:

I am an attorney in the Office of the New York State Attorney General and counsel to Plaintiffs in this action. I submit this Declaration in support of Plaintiffs' memorandum in opposition to Defendants' motion to dismiss.

Attached to this Declaration are true and correct copies of the following numbered exhibits:

1. Declaration of Heidi Shierholz, Senior Economist & Director of Policy, Economic Policy Institute (May 20, 2020).
2. Declaration of Scott Moss, Director at the Division of Labor Standards and Statistics, Colorado Department of Labor and Employment (May 15, 2020).
3. Declaration of Dr. Michael Boone, Director of the Division of Industrial Affairs, Delaware Department of Labor (May 13, 2020).
4. Declaration of Dr. Unique Morris-Hughes, Director, District of Columbia Department of Employment Services (May 15, 2020).
5. Declaration of Yolanda Carrillo, Chief Legal Counsel, Illinois Department of Labor (May 19, 2020).

6. Declaration of Sally Dworak-Fisher, Attorney, Workplace Justice Project of the Public Justice Center (May 15, 2020).
7. Declaration of Heather Rowe, Chief of Investigations, Fair Labor Division, Massachusetts Attorney General's Office (May 15, 2020).
8. Declaration of Sean Egan, Deputy Director for Labor, Michigan Department of Labor and Economic Opportunity (May 12, 2020).
9. Declaration of Nicole Blissenbach, Assistant Commissioner for Enforcement and Compliance Strategies and Partnerships, Minnesota Department of Labor and Industry (May 20, 2020).
10. Declaration of Lesley Hirsch, Assistant Commissioner of Research, New Jersey Department of Labor and Workforce Development (May 15, 2020).
11. Declaration of Sonia Ramirez, Administrator of the Wage and Hour Division, Oregon Bureau of Labor and Industries (May 13, 2020).
12. Declaration of W. Gerard Oleksiak, Secretary, Pennsylvania Department of Labor & Industry (May 19, 2020).
13. Declaration of Joseph Degnan, Assistant Director for the Workforce Regulation and Safety Division, Rhode Island Department of Labor & Training (May 18, 2020).
14. Declaration of Dirk Anderson, Esq., General Counsel to the Commissioner, Vermont Department of Labor (May 15, 2020).
15. Declaration of C. Ray Davenport, Commissioner, Virginia Department of Labor and Industry (May 14, 2020).
16. Declaration of Margaret Leland, Policy Director/Executive Policy Manager of the Governmental Affairs and Policy Division, State of Washington Department of Labor & Industries (May 15, 2020).

Dated: May 21, 2020

/s/ Fiona J. Kaye

Fiona J. Kaye

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